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*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and for the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JAY GAINES & CO., INC. PROFIT SHARING  
PLAN;

JAY GAINES, individually, and in his fiduciary

Adv. Pro. No. 10-05301 (SMB)

capacity as trustee of the JAY GAINES & CO.,  
INC. PROFIT SHARING PLAN; and  
SHERRY GAINES, individually, and in her,  
fiduciary capacity as trustee of the JAY GAINES &  
CO., INC. PROFIT SHARING PLAN,

Defendants.

**CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures were served by February 12, 2012.
2. Fact Discovery shall be completed by August 3, 2015.
3. Substantive Interrogatories were served by March 30, 2012.
4. The Disclosure of Case-in-Chief Experts shall be due November 16, 2015.
5. The Disclosure of Rebuttal Experts shall be due December 16, 2015.
6. The Deadline for Completion of Expert Discovery shall be March 15, 2016.
7. The Deadline for Service of a Notice of Mediation Referral shall be May 16, 2016.
8. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be May 30, 2016.

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9. The Deadline for Conclusion of Mediation shall be September 27, 2016.

Dated: New York, New York  
January 15, 2015

BAKER & HOSTETLER LLP

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